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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CR No. 08-399 PJH
)	
Plaintiff,)	STIPULATION AND [PROPOSED] ORDER
)	EXCLUDING TIME UNDER 18 U.S.C. § 3161
v.)	
)	
JAIME SALCEDO-MENDOZA,)	
)	
Defendant.)	
)	

On July 23, 2008, the parties appeared before the Court for a status conference in this case. At that time, the parties requested, and the Court agreed, to exclude all time under the Speedy Trial Act between July 23, 2008 and July 30, 2008 because the defendant needs additional time to determine which motions he will file. The parties represented that granting the continuance was the reasonable time necessary for effective preparation of defense counsel. 18 U.S.C. § 3161(h)(8)(B)(iv). The parties also agreed that the ends of justice served by granting

1 such a continuance outweighed the best interests of the public and the defendant in a speedy trial.
2 18 U.S.C. § 3161(h)(8)(A).

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4 SO STIPULATED:

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6 JOSEPH P. RUSSONIELLO
United States Attorney

7
8 DATED: July 23, 2008

_____/s/
9 TAREK J. HELOU
Assistant United States Attorney

10
11 DATED: July 23, 2008

_____/s/
12 RONALD TYLER
Attorney for Defendant JAIME SALCEDO-MENDOZA

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14 For the reasons stated above, the Court finds that exclusion of time from July 23, 2008
15 through July 30, 2008 is warranted and that the ends of justice served by the continuance
16 outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §
17 3161(h)(8)(A). Failure to grant the requested continuance would deny the defendant effective
18 preparation of counsel, and would result in a miscarriage of justice. 18 U.S.C. §
19 3161(h)(8)(B)(iv).

20
21 SO ORDERED.

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23 DATED: 7/29/08

